



# NORFOLK

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## Memorandum

TO: City Council

FROM: Lori A. Crouch, Public Relations Manager

COPIES TO: City Clerk, City Attorney

SUBJECT: Council Interests

DATE: August 21, 2015

I hope you all are enjoying your recess. In today's memo I attached the city's response to the Virginia Department of Transportation's (VDOT) request to be a Participating Agency for the upcoming Supplemental Environmental Impact Statement for the Hampton Roads Crossing Study.

Have a nice weekend.



# *CITY OF NORFOLK*

*Office of the City Manager*

Marcus D. Jones  
City Manager

29 July 2015

Mr. Scott Smizik  
Project Manager  
Environmental Division  
Virginia Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219-2000

Project: Hampton Roads Crossing Study  
Cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, Suffolk,  
Virginia Beach and Isle of Wight County  
VDOT Project Number 0064-965-081, P101; UPC: 106724

Dear Mr. Smizik:

In response to VDOT's June 19, 2015 letter to Mayor Paul D. Fraim on the above subject, the City of Norfolk formally accepts the opportunity to be a Participating Agency for the upcoming Supplemental Environmental Impact Statement (SEIS) study process for the Hampton Roads Crossing Study. This is the most critically important transportation improvement project to the future of the entire Hampton Roads region. This current effort needs to move forward in a timely manner so that the new crossing implementation planning can move forward as rapidly as feasible.

It is important to highlight several issues related to the study from the outset. Although the formal federal Record of Decision for the original Hampton Roads Crossing Study is approximately fifteen years old, the region has not stood still since that time. Rather, multiple efforts, studies and analyses, advanced since 2001, have continued to validate the region's selection of the Patriots Crossing/Third Crossing corridor as the priority location for a new crossing of the harbor. This work includes region-wide transportation network modeling work by the Virginia Modeling and Simulation Center in 2011, an Environmental Assessment of the Patriots Crossing components of the larger crossing project (2011), and formal resolutions by the Hampton Roads Transportation Planning Organization in 2013 re-endorsing the project as the region's priority for new Harbor Crossing capacity. Significantly, the Intermodal Connector project in Norfolk between I-564 and Hampton Boulevard, which is the first phase implementation of the Third Crossing, is soon to be under construction. Having this first leg project in place, at a cost of almost \$200M,



gives the region a solid foundation towards finally advancing a new harbor crossing with both improved connectivity and real transportation network benefits.

Secondly, the recent establishment of the new Hampton Roads Transportation Fund now provides for the first time a real opportunity to advance a multi-billion dollar improvement program for a new crossing of Hampton Roads. Therefore, it is critical that the required environmental review and approval processes are completed as quickly as possible since any delays in moving forward into engineering and construction for the new crossing could have major cost implications. We are encouraged that the initial schedule for the SEIS process has been set aggressively with the draft document scheduled for completion by fall 2016. Every effort needs to be made to ensure that this schedule holds and delays are avoided.

We appreciate the opportunity to provide input to the SEIS Scope and to provide any information that we can in advance of the project initiation to help assure an effort that is both expedient and sound. In that regard, we provide the following comments and information, in response to the letter and attached questionnaire:

1. *What parameters, if any, would you recommend be used for establishing a study area boundary in which to analyze the indirect effects and cumulative impacts to potentially affected resources?*

It is important to note that different impacts are realized on different geographic scales and features. It is also important to note that some features are evaluated more quantitatively than less, and others vice versa (using more qualitative, judgment-based processes). Some may permit quantitative analysis in more immediate areas and qualitative at a broader scale. With these things in mind, there are several evaluation criteria that we believe are critical and would have varying levels of geographic scope, in some cases quite large. As we discuss these impact areas, we also have to bring up the issue of evaluation time frame. If we only think of these impacts over roughly a 20-year period, we will grossly misrepresent the far-reaching impacts of a multi-billion dollar investment that will impact the region for many decades and beyond.

So with that preface, here are several parameters/criteria that we would like considered along with some commentary on impact area and time period:

- Regional Accessibility (Region, but focused on Peninsula/Norfolk/northern Virginia Beach)
- Environmental Impacts of land development (Region)
- Economic Impacts (Region, possibly state)
- Social Impacts (Region)

- Homeland Security/Defense (Nation)
- Resiliency (Region)
- Disaster Response (Region)
- Evacuation (Region)

It is easy to argue that the above items simply have no time horizon, at least not one that we can see. We can certainly envision how this study considers how these impacts over a 50-year period could shift the view of how their impacts might be considered just in 2040.

2. *Planning judgment is a structured process that will be used as part of this study to analyze and forecast potential indirect and cumulative impacts. Does your agency possess any reports, data sources, or expert input that you recommend to be used to inform the use of planning judgment in this study? Additionally, any other tools or resources that your agency might be able to provide to aid in the identification of indirect and cumulative impacts would be appreciated and considered.*

Planning judgment will be the most important evaluation tool for many aspects of this study, including those listed in Question 1. These factors can all be considered in the context of long-term benefits/impacts using quantitative support, expert discussion and the application of experiential knowledge. It is important that risk factors be identified and applied to this effort, understanding that there are many possible events and outcomes, some of which there is no control over and some of which can be influenced by the project.

Norfolk's general plan, planNorfolk2030 establishes some of the vision for Norfolk's future. It is predominantly a land-use plan and although it does not attempt to quantify a future with regard to magnitude, it establishes a vision for a compact city with transportation alternatives – a place that can serve a more compact and denser community. Norfolk has begun to undertake major long-range planning efforts, including "Vision 2100", to identify further details that will allow the City to reach for those goals. In concert with this vision Norfolk is also beginning an EIS for the Naval Station Norfolk Transit Extension.

Norfolk will be at the ready throughout this study to provide expert input that is relevant both locally and regionally. While this information is not in documents that can be transferred at this time, we will produce/facilitate key information beginning in the Purpose and Need phase of the study.

There are a number of published reports from the past, related directly to this project, and regionally prepared documents that are indirectly related. You may be aware of most of these, but we have compiled a list for your use, which is attached.



Another regional document of critical importance is the HRTPO's forecast of socioeconomic data (TAZ data) for use in the 2040 travel demand model (located at: [http://www.hrtpo.org/uploads/docs/HR\\_2040\\_SocioeconomicForecast\\_TAZAllocation\\_Final\\_Report.pdf](http://www.hrtpo.org/uploads/docs/HR_2040_SocioeconomicForecast_TAZAllocation_Final_Report.pdf)). This product will have an immense influence on the traffic assignments and trip markets identified for the year 2040. In the vein of this "planning judgment" question, it is critical to recognize that this data is an estimate of one possible future, and a short-term one at that considering the impact of this project. These forecasts that allocated population and employment among local jurisdictions appear to be based more on the continuation of long-standing trends toward suburbanization, rather than trends that are emerging. These emerging trends are noted in the draft VTrans 2040 Vision Plan, consistent with the apparent changes in urban living preferences for Millennials and aging Boomers.

Planners have become more cognizant in recent years that transportation infrastructure and services can, rather than "chase" traffic, be the force that changes development patterns. While the estimates of travel characteristics from the model will provide important input, it must be recognized that this information is just one source and that planning judgment, with some sensitivity analysis regarding these items, is essential. The best investment will create the best opportunity for the kind of future that is desired for the region, from the perspective of strong foundational planning principles associated with smart growth.

The document referenced in the letter, *Forecasting Indirect Land Use Effects of Transportation Projects*, predominantly tackles most of the issues described above. In some cases it references more sophisticated quantitative analytical techniques that can attempt to better capture some of these items. Again, given the long-term nature of this investment, we don't feel that additional analytical forecasts are a requirement, but that the principles discussed in this document are addressed through expert judgment. That expert judgment is critical to the selection of the most appropriate alternative, and is arguably more meaningful than the gross quantitative estimates that will be produced along the lines of typical study analysis for transportation impacts.

3. *As part of the scoping package we have provided a snapshot of recent economic and social data from the United States Census Bureau, we seek your concurrence that this data reflects your current jurisdictional population profile. Additionally, please identify locations in the study area where environmental justice populations may exist, or groups that interact with these environmental justice populations.*

The Census data generally provides an accurate snapshot of current conditions in Norfolk and the larger region.



With regard to Environmental Justice populations, there are numerous communities in Norfolk that meet one or more of Environmental Justice definitions. The Hampton Roads Transportation Planning Organization recently updated its comprehensive Environmental Justice plan. This document, including mapping of areas, is available at the link below.  
<http://www.hrtpo.org/page/ej-methodology-tool/>

4. *What are the current planned projects within your jurisdiction/study area? Are there any public documents/permits that estimate the impacts of these projects?*

Current transportation projects impacting the proposed study area include the Hampton Boulevard/Greenbrier Avenue grade separation, the I-564 Intermodal Connector project, and the Air Terminal Interchange study. The Virginia Department of Transportation is a full partner in each of these efforts and holds copies of all relevant documents and permits. A more long range planned improvement in the area is the proposed highway/rail grade separation at the intersection of Hampton and Terminal Boulevard. There is no funding or established planned schedule for this project at this time.

5. *Please provide any other comments or feedback that you feel may be beneficial to the development of the study.*

Clearly, the overall key to a successful effort at this time will be development and agreement on the Purpose and Need for the project. The primary Purpose and Need elements from the original crossing study provide a firm foundation for beginning the current study. Specifically the original Purpose and Need included: improving accessibility, mobility and goods movement, serving origin and destination patterns between the Peninsula and the Southside, and connecting to ports and freight corridors. In addition, new issues emerging over the last decade or more such as smart growth principles, including multi-modal capabilities and resiliency should be considered for addition to the project Purpose and Need. In fact all of the items identified in the response to Question 1 should be reflected in some way through the Purpose and Need identification. Further, it should be recognized that capacity and congestion have a dynamic relationship, particularly in instances where a large latent demand exists, as it clearly does in this case. When capacity is added the outcome is likely to result in a similar "equilibrated" condition, with more cross-Hampton Roads travel. The Purpose and Need reflecting improving accessibility and mobility is a sound objective, but we need to be careful about inferring that this and reducing peak-hour congestion at the HRBT necessarily have a strong relationship. We look forward to participating fully in these early discussions to define and structure the study for a positive investment outcome.

It must be considered that accessibility and mobility are criteria that are impacted in ways that go far beyond the congestion that occurs on typical weekday peak periods, and that the



impacts of poor accessibility and mobility go far beyond measures of peak-period travel delay. Accessibility is heavily influenced by probabilities of travel times, a feature in recent years brought forward by newly available measures of travel time reliability, such as Travel Time Index (TTI) and Planning Time Index (PTI). It is also a 24/7/365 issue. Accessibility is a key influencer of travel decision-making, and consequently, land development decisions, as well as overall quality of life. Total congestion and its impacts on elements such as safety and air quality is a product of both recurring and non-recurring congestion. For evaluating the numerous associated key issues, it is critical that the impacts of all congestion be addressed.

In addition to the judgment that can be applied to this issue, the State now has access to travel time data via INRIX and/or its own sensors that can be used to describe existing travel time reliability measures. This would be valuable support information for describing the impacts of non-recurring congestion, and should be added to the study scope. As you may know, the HRTPO used this data for its 2013 System Performance report for the Hampton Roads Congestion Management Process. That report estimated that the segment of I-64 included in the CBA 1 alternative (existing alignment) is the most congested facility in the region (per TTI) and the least reliable facility in the region (per PTI). It should be noted that PTI and TTI as calculated are both positively impacted by additions to capacity, but in different ways. Greater improvements to PTI, and greater improvements to accessibility, are likely to be achieved by adding capacity *and* network redundancy.

It is also possible to "mine" data from the regional travel demand model that provides intelligence beyond a traffic assignment. Multiple efforts should be undertaken to both assure the model results are providing reasonable information through products such as select-link or trip purpose (such as trucks due to the new truck model) analysis, and these products should also be used for future-year analysis to better inform the process. The City of Norfolk would like to have an integral participatory role in the modeling activities to facilitate a sound evaluation process and eliminate unnecessary reviews.

In previous studies system VMT measurements were used as a quantitative evaluation factor. Other system measurements can be obtained that will further inform the evaluation of alternatives with regards to travel times, delay and congestion. Performance impacts on all interstate links in the region should also be reported. The CBA 9 alternative reduces volume demand on the entire portion of I-64 on the southside and segments of I-264. The model network may also provide a useful tool for examining the benefits of network redundancy in non-recurring congestion scenarios. We would like to discuss these opportunities in more detail.

Transitioning to discussing the alternatives themselves, we are a bit concerned that while it has been said that the study must include the three alternatives from the original EIS, it has also been said that the CBA 1 alternative will be modified so that it will fit within existing right-of-way (the term "practical design" has been used to describe this approach). These


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two statements seem incongruent, and it brings into question whether the alternatives really start out on equal footing. This "replacement" alternative has not really been described and as such is impossible to comment on. While we understand the concept of practical design in forwarding pragmatic project investments, it is not clear if it is believed that this concept can only be applied to that alternative alignment, or if equal effort will be applied to approaching the entire study in this manner. Certainly it seems that it should, and a reduced-capacity third crossing alternative is just as viable an approach as a reduced-capacity I-64 alternative. In fact, a good portion of the CBA 9 alternative associated with I-664 improvements has little to do with improving accessibility across the Hampton Roads channel, as opposed to much longer trips between the Peninsula and Suffolk/Chesapeake.

Lastly, while it is appropriate to begin the current SEIS analysis with the alignments carried forward to public hearing in the original study, it should be remembered that CBA 2 was developed late in the process as a hybrid option that garnered little support. In this study, so that time and resources are not wasted, inferior options should be eliminated as soon as practicable. A focused and tiered alternatives evaluation process should be adopted, and should apply to any alternatives, including an I-64 alignment.

Please advise if you have any questions or if we can be of further assistance at this time. Thank you for the opportunity to comment and we look forward to working closely with the State and all other partners to bring this effort to a successful conclusion as rapidly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marcus D. Jones', with a stylized, cursive script.

Marcus D. Jones  
City Manager

Attachment – Listing of Relevant Plans, Studies and Reports



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**List of Studies and Reports (supporting question 3)**

*planNorfolk2030* (Norfolk General Plan) <http://www.norfolk.gov/index.aspx?nid=1376>

Hampton Roads Crossing Study EIS  
<http://www.virginiadot.org/projects/resources/studyhro-crossing-feis.PDF>

Patriots Crossing Draft Environmental Assessment  
[http://www.virginiadot.org/projects/resources/hampton\\_roads/Draft\\_HRCS\\_EA\\_11-30-11.pdf](http://www.virginiadot.org/projects/resources/hampton_roads/Draft_HRCS_EA_11-30-11.pdf)

Virginia Modeling and Simulation Hampton Roads Transportation Alternatives  
[http://www.hrtpo.org/MTG\\_AGNDs/HRTPO/2011/retreat/P5VMASC\\_Hampton\\_Roads\\_Alternative\\_Study.pdf](http://www.hrtpo.org/MTG_AGNDs/HRTPO/2011/retreat/P5VMASC_Hampton_Roads_Alternative_Study.pdf)

Truck Delay Impacts of Key Planned Highway projects  
<http://www.hrtpo.org/uploads/docs/Truck%20Delay%20Impacts%20of%20Key%20Planned%20Hwy%20Projects%20Final%20Report.pdf>

Existing and Future Truck Delay in Hampton Roads  
<http://www.hrtpo.org/uploads/docs/Existing%20and%20Future%20Truck%20Delay%20in%20HR%20Final%20Report.pdf>

Hampton Roads Roadways Serving the Military – Sea Level Rise  
<http://www.hrtpo.org/uploads/docs/Roadways%20Serving%20the%20Military%20&%20Sea%20Level%20Rise-Storm%20Surge%20Report.pdf>

Hampton Roads Roadways Serving the Military – Needs Study  
<http://www.hrtpo.org/uploads/docs/T12-11%20Military%20Commuter%20Survey%202012%20FINAL%20Report.pdf>

Virginia Port Authority Master Plan  
<http://www.portofvirginia.com/pdfs/about/vpamasterplan052113.pdf>